



July 28, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 96-45

Dear Ms. Dortch:

On August 11, Amina Fazlullah of the Benton Foundation, and Harold Feld and John Bergmayer of Public Knowledge, met with Zachary Katz of the Chairman's office to discuss the Commissions recent Public Notice seeking information in the USF/ICC proceeding.<sup>1</sup>

PK/Benton discussed their proposal to require that USF fund recipients make interconnection points and backhaul capacity available to unserved areas, which could allow some local communities to serve themselves that otherwise could not.<sup>2</sup> They described how this idea is intended to allow all kinds of entities—from commercial WISPs to nonprofits to community centers PK/Benton outlined their plans to increase stakeholder participation in the proceeding, to give the Commission data points about the challenges that local broadband providers can face. This proposal differs from a bare requirement to charge reasonable rates for backhaul, in that it also contains a duty to serve.

PK/Benton also discussed how a “mini BTOP” could improve broadband in some communities. This one-time fund would enable equipment purchases and infrastructure upgrades by the same kinds of groups the interconnection/backhaul requirement benefits—entities who are not as “plugged in” to the USF process as some other carriers.

Respectfully submitted,

/s John Bergmayer  
Senior Staff Attorney  
Public Knowledge

---

<sup>1</sup> Further Inquiry Into Certain Issues In The Universal Service- Intercarrier Compensation Transformation Proceeding, WC Docket Nos. 10-90, Rel. Aug. 3, 2011.

<sup>2</sup> Letter from John Bergmayer, Public Knowledge, to Marlene H. Dortch, FCC, WC Docket No. 10-90 (filed July 28, 2011).